

1 BARRY REIFERSON (*pro hac vice*)
2 Email: barry.reiferson@cfpb.gov
3 MEGHAN SHERMAN CATER (*pro hac vice*)
4 Email: megan.sherman@cfpb.gov
5 JADE A. BURNS (*pro hac vice*)
6 Email: jade.burns@cfpb.gov
7 LEANNE E. HARTMANN, CA Bar #264787
8 Email: leanne.hartmann@cfpb.gov
9 Consumer Financial Protection Bureau
10 1700 G Street, NW
11 Washington, DC 20552
12 Telephone: (212) 328-7020
13 Facsimile: (202) 435-7329
14 Attorneys for Plaintiff
15 Consumer Financial Protection Bureau
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

Consumer Financial Protection
Bureau,

Plaintiff,

v.

D and D Marketing, Inc., d/b/a
T3Leads, *et al.*,

Defendants.

Case No. 2:15-cv-09692-PSG-E

STIPULATION MEMORIALIZING
PLAINTIFF'S AGREEMENT TO RESTRICT
THE SCOPE OF PLAINTIFF'S CLAIMED
RELIEF

Hon. Philip S. Gutierrez,
First Street Courthouse, 350 West 1st Street,
Courtroom 6A

1 Plaintiff Consumer Financial Protection Bureau (“Bureau”), in compliance
 2 with the Court Order at ECF No. 89, and as stated in its May 23, 2017 amended
 3 initial disclosures to defendants D and D Marketing, Inc., d/b/a T3Leads (“T3”);
 4 Davit Gasparyan (a/k/a David Gasparyan); Dmitry Fomichev; Marina Demirchyan;
 5 and Grigor Demirchyan (collectively, “Defendants”), stipulates that it will seek no
 6 more than the following relief in these related cases:

7 A. Injunctive relief as may be necessary to prevent consumer injury during
 8 the pendency of this action and to preserve the possibility of effective final
 9 relief;

10 B. Permanent injunction to prevent Defendants from committing future
 11 violations of the Consumer Financial Protection Act of 2010, 12 U.S.C. §§
 12 5531, 5536(a)(1), or any provision of “Federal consumer financial law,” as
 13 defined by 12 U.S.C. § 5481(14);

14 C. Disgorgement of Defendants’ revenues in connection with T3’s
 15 business;

16 D. Disgorgement of Defendants’ unjust enrichment in connection with
 17 T3’s business; and

18 E. Civil money penalties under 12 U.S.C. § 5565(c) and 12 C.F.R.
 19 § 1083.1.

20
 21 Dated: June 2, 2017

22 CONSUMER FINANCIAL PROTECTION BUREAU

23 By: /s/ Barry Reiferson
 24 Attorney for Plaintiff,
 25 Consumer Financial Protection Bureau
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